

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|---|---|--|
| In re: |) | Chapter 11 |
| |) | |
| W. R. GRACE & CO., et al., ¹ |) | Case No. 01-01139 (KJC) |
| |) | (Jointly Administered) |
| Reorganized Debtors. |) | |
| _____ |) | Re: Docket Nos. 31812, 31856, 31873, 32044, 32068, 32233, 32324, 32503, 32560, 32570, 32571, 32607, 32641, 32642, 32650 |

**ORDER APPROVING THIRD AMENDED STIPULATION FOR BRIEFING
SCHEDULE AND HEARING DATE FOR ANDERSON MEMORIAL HOSPITAL'S
MOTION TO ALTER OR AMEND ORDER DENYING MOTION FOR CLASS
CERTIFICATION**

Upon consideration of the Third Amended Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital's ("AMH") Motion to Alter or Amend Order Denying Motion for Class Certification attached hereto as Exhibit 1 (the "Second Amended Stipulation") and after due deliberation and sufficient cause appearing therefore;

IT IS HEREBY ORDERED THAT:

1. The Third Amended Stipulation and all of its terms are approved.
2. As set forth in the Stipulation:
 - (a) AMH shall submit its reply by April 11, 2016, and AMH's reply shall be no longer in number of words than half the number of words of Reorganized Debtors' responsive brief;
 - (b) To the extent necessary, the page limits in Local Rule 7007-2 may be exceeded; and

¹ The Reorganized Debtors are W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.) and W. R. Grace & Co.-Conn. At the time of filing of AMH's Motion, there were 62 debtors. On March 19, 2014, Grace filed and the Court entered a Final Decree which, *inter alia*, closed the Chapter 11 cases of certain Merged Subsidiaries. [Docket No. 31880] On September 16, 2014, Grace filed a motion closing the Chapter 11 cases of certain additional Grace subsidiaries, and on October 14, 2014, the Court entered a Final Decree which, *inter alia*, closed the Chapter 11 cases of certain Grace subsidiaries. [Docket No. 32429] Accordingly, Grace and Grace-Conn. are the surviving Reorganized Debtors.

(c) A hearing will be held on AMH's request for class certification on the first omnibus hearing date that is at least fifteen (15) business days after the completion of briefing or on such other date as may be agreed upon by the parties and the Court or ordered by the Court.

3. The Court shall retain jurisdiction to hear and determine all matters arising from or in connection with the implementation, enforcement and interpretation of this Order.

Dated: _____, 2016

The Honorable Kevin J. Carey,
United States Bankruptcy Court Judge

EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|---|---|--|
| In re: |) | Chapter 11 |
| |) | |
| W. R. GRACE & CO., et al., ¹ |) | Case No. 01-01139 (KJC) |
| |) | (Jointly Administered) |
| Reorganized Debtors. |) | |
| _____ |) | Re: Docket Nos. 31812, 31856, 31873, 32044, 32068, 32233, 32324, 32503, 32560, 32570, 32571, 32607, 32641, 32642, 32650 |

**THIRD AMENDED STIPULATION FOR BRIEFING SCHEDULE AND HEARING
DATE FOR ANDERSON MEMORIAL HOSPITAL'S MOTION TO ALTER OR
AMEND ORDER DENYING MOTION FOR CLASS CERTIFICATION**

On March 5, 2014, Anderson Memorial Hospital ("AMH") filed its *Motion to Alter or Amend Order Denying Motion for Class Certification and for Entry of Scheduling Order and Granting Related Relief* (the "Motion"). The Court having considered the Motion, the Objection filed by the Reorganized Debtors and the Reply filed by AMH, and having held a hearing on April 15, 2015;

And the Court having entered an Order Regarding Anderson Memorial Hospital's Discovery Request and directing the parties to submit a proposed scheduling order regarding the filing of briefs on the issue of class certification (5/5/15, Dkt. 32560);

And the Court having approved the proposed scheduling order submitted by the parties and amended proposed scheduling orders submitted by the parties (8/25/15, Dkt. 32607; and 11/25/15, Dkt. 32642);

And the parties having agreed to a further amended proposed scheduling order;

¹ The Reorganized Debtors are W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.) and W. R. Grace & Co.-Conn. At the time of filing of AMH's Motion, there were 62 debtors. On March 19, 2014, Grace filed and the Court entered a Final Decree which, *inter alia*, closed the Chapter 11 cases of certain Merged Subsidiaries. [Docket No. 31880] On September 16, 2014, Grace filed a motion closing the Chapter 11 cases of certain additional Grace subsidiaries, and on October 14, 2014, the Court entered a Final Decree which, *inter alia*, closed the Chapter 11 cases of certain Grace subsidiaries. [Docket No. 32429] Accordingly, Grace and Grace-Conn. are the surviving Reorganized Debtors.

Therefore, with respect to the Motion, IT IS HEREBY STIPULATED AND AGREED, by, between, and among the undersigned, the attorneys of record for Reorganized Debtors W. R. Grace & Co., et al. ("Grace") and AMH, subject to the approval of the Court, that:

- 1) AMH shall submit its reply by April 11, 2016, and AMH's reply shall be no longer in number of words than half the number of words of Reorganized Debtors' responsive brief;
- 2) To the extent necessary, the page limits in Local Rule 7007-2 may be exceeded; and
- 3) A hearing will be held on AMH's request for class certification on the first omnibus hearing date that is at least fifteen (15) business days after the completion of briefing or on such other date as may be agreed upon by the parties and the Court or ordered by the Court.

Dated: February 29, 2016

FERRY JOSEPH, P.A.



Theodore J. Tacconelli (No. 2678)
Ferry Joseph, P.A.
824 Market Street, Suite 1000
P.O. Box 1351
Wilmington, DE 19899
Telephone: (302) 575-1555
Facsimile: (302) 575-1714

And

Daniel A. Speights (SC Fed. ID No. 4252)
A. Gibson Solomons (SC Fed. ID No. 7769)
SPEIGHTS & RUNYAN
100 Oak Street East
P.O. Box 685
Hampton, SC 29924
Telephone: (803) 943-4444
Facsimile: (803) 943-4599

And

John W. Kozyak (FL Bar No. 200395)
David L. Rosendorf (FL Bar No. 996823)
KOZYAK TROPIN & THROCKMORTON
2525 Ponce de Leon, 9th Floor
Coral Gables, FL 33134
Telephone: (305) 372-1800
Facsimile: (305) 372-3508

Counsel for Anderson Memorial Hospital

PACHULSKI STANG ZIEHL & JONES LLP



Laura Davis Jones (Bar No. 2436)
James E. O'Neill (Bar No. 4042)
919 N. Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705
Telephone: (302) 652-4100
Facsimile: (302) 652-4400

And

KIRKLAND & ELLIS LLP
John Donley, P.C.
Lisa Esayian
300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200

Attorneys for Reorganized Debtors